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7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 JESSICA HALVERSON, an individual,

10 Plaintiff,

11 vs.

12 MISSION SUPPORT AND TEST
 13 SERVICES, LLC, a Delaware limited-
 liability company.

14 Defendants.

Case No.: 2:24-cv-00201-RFB-BNW

JOINT MOTION TO STAY
DEADLINES PENDING
SETTLEMENT DISCUSSIONS
(ECF NO. 24)

16 Plaintiff JESSICA HALVERSON and Defendant MISSION SUPPORT AND
 17 TEST SERVICES, LLC, by their respective counsel, hereby jointly move this honorable
 18 Court to the following:

19 1. An extension of the stay of discovery and other deadlines (ECF No. 24) will
 20 allow the Parties to explore the possibility of settlement, without incurring the time and
 21 expense of ongoing discovery during settlement discussions.

22 2. The Parties are scheduled to participate in an Early Neutral Evaluation on
 23 January 28, 2025. (ECF No. 30), the time and expense of which would also be avoided if
 24 settlement is reached beforehand.

25 3. On or before December 9, 2024, Plaintiff will send a demand to Defendant.

26 4. The Parties are seeking a thirty (30) day stay of all deadlines unrelated to
 27 the Early Neutral Evaluation (*i.e.*, discovery deadlines set forth in ECF No. 24) to reach and
 28 finalize a settlement agreement.

1 5. Should a settlement not before the expiration of the stay, the deadlines
 2 adjusted as set forth below:

Deadline	Current Deadline (ECF No. 24)	Proposed New Deadline
Discovery Cut-Off	December 31, 2024	January 30, 2025
Dispositive Motions	January 31, 2025	March 3, 2025¹
Joint Pretrial Order ²	March 3, 2025	April 2, 2025

8 6. The Parties represent that this stay is being sought in good faith for the
 9 purposes of resolving this matter while preserving the Parties', their counsel's and the
 10 Court's time and resources.

11 **IT IS SO STIPULATED.**

12
 13 DATED this 9th day of December, 2024.

14
 15 **MCLETCHE LAW**

16 By: */s/ Leo S. Wolpert*

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16 DATED this 9th day of December, 2024.

17 **WILSON, ELSE, MOSKOWITZ,
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18 By: */s/ James V. Lovett*

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 26
 27 ¹ 30 days from January 31, 2025, is Sunday, March 2, 2025.

28 ² If a dispositive motion is filed, the Joint Pretrial Order will be filed 30 days after the decision
 on the dispositive motion.

ORDER

IT IS SO ORDERED.

U.S. MAGISTRATE JUDGE

DATED: 12/11/2024

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